

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

COALITION FOR TJ,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 1:21-cv-00296-CMH-JFA
)	
FAIRFAX COUNTY SCHOOL BOARD,)	
)	
Defendant.)	

DEFENDANT’S OBJECTIONS TO PLAINTIFF’S WITNESS LIST

The Defendant, Fairfax County School Board (“Defendant”), states the following objections to the Plaintiff’s Witness List, pursuant to Fed. R. Civ. P. 26(a)(3)(A)(ii):

1. **Harry Jackson.** Plaintiff has not timely or adequately disclosed this witness. Plaintiff did not disclose Mr. Jackson as a person likely to have discoverable information in its initial disclosures under Rule 26(a)(1)(A)(i), nor supplement its disclosures to so identify Mr. Jackson at any point throughout discovery.

2. **Ying McCaskill.** Plaintiff has not timely or adequately disclosed this witness. Plaintiff did not disclose Mr. McCaskill as a person likely to have discoverable information in its initial disclosures under Rule 26(a)(1)(A)(i), nor supplement its disclosures to so identify Mr. McCaskill at any point throughout discovery.

3. **Dipika Gupta.** Plaintiff has not timely or adequately disclosed this witness. Plaintiff did not disclose Ms. Gupta as a person likely to have discoverable information in its initial disclosures under Rule 26(a)(1)(A)(i), nor supplement its disclosures to so identify Ms. Gupta at any point throughout discovery.

4. **Asra Nomani, Glenn Miller, and Himanshu Verma.** Plaintiff disclosed these witnesses as only having knowledge of the Coalition’s “Fourteenth Amendment interests in this case” in its initial disclosures under Rule 26(a)(1)(A)(i) and did not supplement its disclosures at any point throughout discovery to identify any other subjects of discoverable knowledge. The School Board, therefore, objects to these witnesses being permitted to testify to any matters other than Plaintiff’s “Fourteenth Amendment interests in this case.”

Respectfully submitted,

FAIRFAX COUNTY SCHOOL BOARD

By: /s/

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*Counsel for Defendant Fairfax County School
Board*

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of November, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record for all Parties.

/s/
Sona Rewari (VSB No. 47327)